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June 14, 2021

Honorable Joseph F. Bianco
Visiting United States District Judge
Eastern District of New York
United States Courthouse
100 Federal Plaza
Central Islip, New York 11722

BY ECF

Re: United States v. Constantine
13 Cr. 607 (JFB)

Dear Judge Bianco:

Defendant Tommy Constantine ("Constantine") respectfully submits this letter to provide the Court with an update on two outstanding issues before the Court. First, he has undergone the medical testing previously described to the Court and is scheduled to receive the results at an appointment on July 2, 2021. A supplemental update letter will subsequently be filed with the Court. Second, co-defendant Phillip Kenner, through his standby counsel, has informed Constantine that he is not willing to waive the attorney/client privilege. However, Kenner stated that he would be amenable to, and assist in, any reasonable procedure put in place to expedite the review of the relevant electronic device or devices.

Thank you for your Honor's consideration on these issues.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Matthew Haggans (by ECF)
AUSA Saritha Komatireddy (by ECF)
Matthew Brissenden, Esq. (by ECF)